

THAD A. DAVIS (SBN 220503)
thad.davis@ropesgray.com
ROCKY C. TSAI (SBN 221452)
rocky.tsai@ropesgray.com
ROPES & GRAY LLP
Three Embarcadero Center, Ste 300
San Francisco, California 94111-4006
Tel: (415) 315- 6300
Fax: (415) 315-6350

HARVEY J. WOLKOFF (Subject to admission *pro hac vice*)
harvey.wolkoff@ropesgray.com
MARK P. SZPAK
mark.szpak@ropesgray.com
LARA A. ORAVEC
lara.oravec@ropesgray.com
ROPES & GRAY LLP
Prudential Tower, 800 Boylston Street
Boston, MA 02199-3600
Tel: (617) 951-7606
Fax: (617) 235-0215

Attorneys for Defendants

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ARTHUR SANCHEZ, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

SONY COMPUTER ENTERTAINMENT
AMERICA, LLC, a Delaware Limited Liability
Company; SONY NETWORK
ENTERTAINMENT INTERNATIONAL LLC, a
Delaware Limited Liability Company; and SONY
CORPORATION OF AMERICA, a New York
Corporation,

Defendants.

Case No. 4:11-cv-02181-RS

**STIPULATION TO EXTEND
TIME FOR DEFENDANTS TO
MOVE, ANSWER, OR
OTHERWISE RESPOND TO
COMPLAINT**

Judge: Hon. Richard Seeborg

STIPULATION TO EXTEND TIME FOR DEFENDANTS TO
RESPOND TO COMPLAINT
CASE NO. 4:11-cv-02181-RS

1 WHEREAS, defendants Sony Computer Entertainment America LLC ("SCEA"), Sony
2 Network Entertainment International LLC ("SNEI"), and Sony Corporation of America ("SCA"),
3 as well as certain related entities (collectively, the "Sony Defendants"), have been named as
4 defendants in at least twenty-five (25) putative class action lawsuits within this District, to date;

5 WHEREAS, certain of the Sony Defendants have also been named as defendants in at
6 least nineteen (19) putative class action lawsuits pending outside this District, to date;

7 WHEREAS, a motion is currently pending before the Judicial Panel on Multidistrict
8 Litigation (the "JPML") to centralize this and other matters, to which one response has been filed
9 to date, and as to which other responses, including Sony Defendants' response, are due by June 2,
10 2011.

11 WHEREAS, the current deadline for SCEA, SNEI, and SCA to respond to the Complaint
12 is June 15, 2011;

13 WHEREAS, the parties have agreed to the extension of time herein for the defendants in
14 the above-captioned action to move, answer, or otherwise respond to the Complaint, in order to
15 facilitate the scheduling of this matter in coordination with the schedule for the motion before the
16 JPML;

17 NOW, THEREFORE, pursuant to Civil Local Rules 6-1(a), 7-1(a), and 7-12, all parties,
18 by and through their respective counsel, hereby stipulate as follows:

19 The deadline for the defendants to respond to the Complaint in the above-captioned action
20 is extended until and including 30 days after a consolidated complaint is filed in a multidistrict
21 litigation centralizing the above-captioned action with other matters, or if centralization is denied
22 by the JPML, then 30 days from the date of such order denying centralization.

23 ///

1 Either party may seek ex parte relief from this stipulated Order for good cause shown,
2 including, but not limited to, Defendants' filing of a responsive pleading in a related case.

3
4 Dated: May 31, 2011

L. TIMOTHY FISHER
SARAH N. WESTCOT
BURSOR & FISHER, P.A.

5
6 By: /s/ Sarah N. Westcot /s/ [as authorized]
Sara N. Westcot
Attorneys for Plaintiff
ARTHUR SANCHEZ

7
8
9 Dated: May 31, 2011

HARVEY WOLKOFF
THAD A. DAVIS
ROCKY C. TSAI
ROPES & GRAY LLP

10
11 By: /s/ Rocky C. Tsai /s/
Rocky C. Tsai

12
13 Attorneys for Defendants
SONY COMPUTER
14 ENTERTAINMENT AMERICA LLC,
SONY NETWORK ENTERTAINMENT
15 INTERNATIONAL LLC and
SONY CORPORATION OF AMERICA.

16
17 **[PROPOSED] ORDER**

18 PURSUANT TO STIPULATION, IT IS SO ORDERED.

19
20 Dated: 6/1/11

21 By: 
U. S. District Court Judge